

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
WESTERN DIVISION

CIVIL ACTION NUMBER
3:23-CV-30093-MGM

STEPHEN D. WOODBRIDGE,)
and)
ROBERTA BROWNING)
Plaintiffs,)
)
v.)
)
CITY OF GREENFIELD,)
)

Defendant.)

Dated: June 25, 2024

**JOINT MOTION TO STAY ALL PRETRIAL DEADLINES AND CONTINUE THE
LOCAL RULE 16.1 SCHEDULING CONFERENCE TO THE LAST WEEK OF JULY**

NOW COME, the Plaintiffs and the Defendant in the above-entitled action and respectfully request that the Court temporarily stay all pretrial deadlines and continue the Local Rule 16.1 scheduling conference from June 28, 2024 to the last week of July 2024.

As grounds for this Joint Motion, the Parties assert the following:

- (1) The Parties have been making progress in settlement discussions and have agreed to promptly exchange information between now and during July to enable each Party to make an informed decision with regard to entering into settlement of this litigation. Such information includes details concerning the costs that the City asserts it incurred in connection with foreclosing on the Plaintiffs' respective properties and details concerning the process leading to the sale of one of the properties at issue in this litigation.
- (2) The Parties believe that a brief stay of pretrial deadlines and postponement of the Scheduling Conference by approximately a month, as requested, will greatly facilitate settlement discussions and may avoid the need for a further scheduling conference with the Court to implement a pre-trial schedule.
- (3) Should this joint Motion be allowed, the Parties agree to inform the Court, prior to the last week in July, concerning the status of settlement. Should their settlement discussions between now and the end of July reach an impasse, the Parties agree to

so inform the Court and submit a Local Rule 16.1(D) Joint Statement in advance of the rescheduled scheduling conference.

- (4) The Parties respectfully request that, if this Joint Motion is allowed, the rescheduled scheduling conference be held by remote means or by telephone.

WHEREFORE, the Parties respectfully request that this Joint Motion be granted.

Respectfully Submitted,
Plaintiffs
STEPHEN D. WOODBRIDGE and
ROBERTA BROWNING

Respectfully Submitted,
Defendant
CITY OF GREENFIELD

By Their Attorneys,

By its Attorneys,

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CERTIFICATE OF SERVICE

I hereby certify that on this 25th day of June, 2024, I electronically filed the *JOINT MOTION TO STAY ALL PRETRIAL DEADLINES AND CONTINUE THE LOCAL RULE 16.1 SCHEDULING CONFERENCE TO THE LAST WEEK OF JULY* with the Clerk of Court using the CM/ECF system and same will be served, while effectuating service upon the Parties to:

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